

THE CITY OF NEW YORK LAW DEPARTMENT

100 CHURCH STREET NEW YORK, NY 10007 LAURA C. WILLIAMS

Labor and Employment Law Division phone: (212) 356-2435 email: lawillia@law.nyc.gov

May 28, 2021

Via ECF

JAMES E. JOHNSON

Corporation Counsel

Honorable Loretta A. Preska United States District Court Southern District of New York 500 Pearl Street, Room 12A New York, New York 10007

Re: Figueroa v. The City of New York, et al.

Civil Action No.: 20-CV-10050

Dear Judge Preska:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, assigned to represent defendants City of New York and New York City Police Department ("City Defendants") in the above-referenced matter. I write to respectfully request a two-week extension of time, from June 2, 2021 to June 16, 2021, for City Defendants to submit their reply to Plaintiff's opposition to City Defendants' motion to dismiss the complaint. This is City Defendants' first request for an extension of time to file their reply, Plaintiff's counsel consents to this request.

This request is made due to the undersigned's very heavy caseload, which includes replies to multiple previously filed motions, as well as responses to federal and state discovery requests in multiple actions. The foregoing obligations necessitate such additional time to finalize City Defendants' response.

SO ORDERED.

Loutta a. Preska

6/2/2021

¹ Upon information and belief, the individually named defendant, Peter Mormile, has not been served with a summons and complaint.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Laura C. Williams Assistant Corporation Counsel

cc: Zachary T. Tortora, Esq. (by ECF) Attorney for Plaintiff